

FILED UNDER SEAL

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

CHARLES G. COPELAND, ET AL.,	§	
	§	
<i>Plaintiff,</i>	§	CIV. ACTION NO.
	§	04:20-cv-00393-SDJ-CAN
v.	§	
	§	
ALAMO BILLING COMPANY and	§	
MANAMED, INC.,	§	
	§	
<i>Defendants.</i>	§	JURY

**DECLARATION OF MITCHELL R. GARRETT IN SUPPORT OF
DEFENDANT MANAMED, INC.'S RESPONSE TO PLAINTIFFS'
MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

Pursuant to 28 U.S.C. § 1746, I, Mitchell R. Garrett, declare:

1. I am an attorney admitted to the Bar of the State of Texas and to this Court, a senior associate at Ryan Law Partners LLP, and counsel of record for Defendant ManaMed, Inc. in the above-captioned case.
2. I make this declaration in support of Defendant ManaMed, Inc.'s Response to Plaintiffs' Motion for Leave to File Second Amended Complaint, dated November 19, 2020, to put certain documents before the Court.
3. I am over the age of twenty-one (21) years and am competent to make this declaration. All of the statements set forth herein are true and correct and are based on my personal knowledge.

4. Attached hereto as **Exhibit A** is a true and correct copy of emails, bates numbered Plf 000013 through Plf 000014, obtained from and produced by Plaintiffs as part of Plaintiffs' initial mandatory disclosures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 19, 2020.

/s/ Mitchell R. Garrett

Andrew B. Ryan
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